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ABSTRACT

The primary purpose of this document is to provide accrediting organizations with guidance about how to engage evidence of student learning as they establish policies, standards, and approaches to review. As a result, it addresses three main topics: (1) accreditors must be clear about terminology when considering evidence of student learning outcomes; (2) accreditors have to face a number of policy choices about evidence of student learning outcomes; and (3) they will encounter a similar set of issues when examining student learning that need to be identified systematically. Accrediting organizations must be more aggressive and creative in requiring evidence of student learning outcomes as an integral part of their standards and processes for review. The accrediting community must become more vocal and articulate in talking about evidence of student learning outcomes, and each individual accreditor must choose a coherent rationale that underlies its approach to student learning outcomes, and then must use this rationale to explain the procedures it adopts. Accreditors need a language with which to talk with one another about what they are doing. All accreditors would benefit form the development of common resources. The growing body of accreditation experience should be organized for use by the community in common. (SLD)

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Accreditation and Student Learning Outcomes: A Proposed Point of Departure

Prepared by Peter T. Ewell

National Center for Higher
Education Management Systems

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September 2001

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CHEA

Council for Higher Education Accreditation

The Council for Higher Education Accreditation (CHEA) is a private, nonprofit national organization that coordinates accreditation activity in the United States. CHEA represents more than 3,000 colleges and universities and 60 national, regional, and specialized accreditors.

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Table of Contents

Accreditation and Student Learning Outcomes: A Proposed Point of Departure 1

Introduction 1
What Is the Problem and How Has Accreditation Responded? 2
Defining the Territory 4
Some Dimensions of Policy Choice 8
Some Enduring Issues 19
Concluding Thoughts 24

Summary of Decisions About Evidence and About the Use of Evidence of Student Learning Outcomes in Accreditation Review and in the Determination of Quality 14

Charts

Chart 1: A Taxonomy of Terms Commonly Used in Connection with the "Assessment" of Student Learning Outcomes 8
Chart 2: Three Dimensions of Policy Change 9
Chart 2A: Program Assessment 13
Chart 2B: Academic Audit 16
Chart 2C: Auditing Academic Standards 17
Chart 2D: Third-Party Certification 18

"First, the task of addressing student learning outcomes has no single or simple answers. Second, it is imperative that accreditors take it on. What is required for them to do so? Three lines of collective action seem warranted.

- First, the accrediting community needs to develop a coherent and understandable way to *explain* its collective approach to the matter of evidence of student learning outcomes to outside stakeholders. This rationale must make it clear that there are appropriate differences among accreditors in how they choose to engage student learning, but that *all* are doing so in appropriate and rigorous ways. But it must also make clear that they are requiring some measure of direct student attainment—not merely proxies for it—in their various approaches.

- Second, accreditors need a *language* with which to talk to one another about what they are doing. This may or may not require the development of a common vocabulary. But it does require a common conceptual framework that allows varied members of the community to understand the key distinctions and similarities among their approaches.

- Third, all would benefit from the development of *common resources*. These might include sharing review approaches and techniques like standards of evidence or ways to "audit" institutional or program assessment efforts. It might also include more fundamental research and development efforts directed toward creating better tools for examining learning or identifying best practices. There is a growing fund of experience to build on here, both within and outside the accreditation community. But the growing body of experience has not yet been effectively "rounded up" for use by the community in common."

From Concluding Thoughts, page 24

Accreditation and Student Learning Outcomes: A Proposed Point of Departure

Introduction

Student learning outcomes are rapidly taking center stage as the principal gauge of higher education's effectiveness. Employers and elected officials have never been clearer in their demand that the graduates of America's colleges and universities should possess an increasingly specific set of higher order literacies and communications skills. Parents and the public—acting as "consumers" of higher education—are looking not just at price, but at the underlying quality of a college credential and what it will buy them in the employment marketplace. Inside the academy (though admittedly not as forcefully) conversations are widening about how to better "organize" institutions of higher education for improved learning. Meanwhile, the growing presence of technology and distance delivery in the landscape of higher education by its very nature enhances the centrality of student learning outcomes. Absent traditional markers of achievement like numbers of classes completed or credits earned, alternative instructional approaches can *only* demonstrate their relative effectiveness in terms of what students have learned.

Accreditation organizations have responded to the growing salience of learning outcomes in a variety of ways. Virtually all now include explicit references to student learning in their standards for accreditation. Most also require institutions or programs to examine student achievement or "institutional effectiveness" as part of their self-study and review processes—usually in the form of some kind of "assessment." In fact, attention to this issue on the part of accreditors in some cases dates back to the mid-1980s. But after more than a decade, the question of exactly *how* accreditation should engage the topic remains unclear. In particular, what is meant by "assessment" often varies greatly—embracing everything from job placement, through student satisfaction, to self-reported gains in skill and knowledge on the part of students and former students. None of these constitute *direct* evidence of student learning outcomes of the kind currently being asked for by external stakeholders.

How should accrediting organizations best position themselves to meet these conditions? On the one hand, it is clear that accreditation must respond effectively and coherently if it is to maintain its central role in quality assurance. On the other, accrediting organizations legitimately differ in the particular postures and levels of engagement that they will adopt with respect to this issue. The primary purpose of this document is to provide accrediting organizations with guidance about how to engage evidence of student learning as they establish policies, standards, and approaches to review. As a result, it addresses three main topics. First, accreditors must be clear about *terminology* and should speak with a common voice when considering evidence of student learning outcomes. Second, accrediting organizations have to face a number of *policy choices* as they approach the matter of evidence of student learning, and it is important to know something about the nature of these choices and their consequences. Finally, all accreditors will encounter a similar set of *issues* when they examine

All Accreditors:

- Must be clear about *terminology* when considering evidence of student learning outcomes;
- Have to face a number of *policy choices* about evidence of student learning outcomes; and
- Will encounter a similar set of *issues* when examining student learning that need to be systematically identified.

student learning, so systematically identifying these issues and discussing how they might appropriately be addressed is a useful exercise.

Throughout the document, we hope two things are clear. First, accreditation must adopt a visible and proactive stance with respect to assuring acceptable levels of student academic achievement. Given escalating stakeholder demands, nothing less will prove sufficient to maintain the public credibility of our voluntary peer-based system. But just as important, we believe it is imperative to avoid orthodoxy. Accrediting organizations can and should differ in the ways in which they approach the specific tasks associated with assuring quality—though the reasons for the choices they make must be understandable and defensible. Both commitments are important if we are to make progress as a community.

- Accrediting organizations—both institutional and specialized—must become more aggressive and creative in requiring evidence of student learning outcomes as an integral part of their standards and processes for review.
- The accrediting community as a whole must become more vocal and articulate in talking about evidence of student learning outcomes, and must evolve a common language with which to do so.
- Each individual accreditor must deliberately choose a coherent rationale that underlies its own approach to student learning outcomes, and must be able to use this rationale to clearly and publicly explain the specific procedures that it adopts.

What Is the Problem and How Has Accreditation Responded?

Systematic public concern about what and how much students are learning in American colleges and universities dates back to the mid-1980s. One stimulus for this concern began in K-12 education, which was felt to be underperforming at "crisis" levels (e.g., *A Nation at Risk*, 1983), and moved up the "grade ladder" into public postsecondary settings (e.g., *Time for Results*, 1986). Another arose simultaneously among employers and business leaders increasingly focused on the need to develop a "21st Century" workforce that was highly literate, well-versed in problem solving and collaborative skills, and equipped with appropriate technical skills to meet the needs of an emerging "knowledge economy." Growing uneasiness within the academy, meanwhile, centered on loss of coherence in the undergraduate experience; at the same time, academic leaders were aware of the evident potential of research-based knowledge about how to occasion better learning among college students (e.g., *Involvement in Learning*, 1984; *Integrity in the College Curriculum*, 1985). Together, these stimuli helped spawn a recognizable "assessment movement" in higher education, evidenced by an expanding array of conferences, publications, measurement techniques, and institutional experiments.

Some accrediting organizations were pioneers in this movement. Among regional accreditors, the Southern Association of Colleges and Schools (SACS) adopted an "institutional effectiveness" standard in 1986 that required every institution under review to provide explicit evidence about its attainment of established goals—among them, goals for student learning. Taking a somewhat different tack, the North Central Association (NCA) required all member institutions to prepare "assessment plans" that focused directly on evidence of "student academic achievement." At the same time, NCA developed workshops and materials designed to help institutions with the task of assessment and began training its peer reviewers to evaluate institutional efforts to examine student learning outcomes. Other regionals followed similar paths—developing handbooks and workshop materials to support institutional efforts and

gradually raising the salience of "assessment" in their respective self-study and review approaches. By the mid-1990s, all had some kind of policy in place.

Selected specialized accrediting organizations were also early proponents of assessment. In the late 1980s, the American Association of Collegiate Schools of Business (AACSB) experimented actively with a direct assessment of core business subjects for adoption by its members on a voluntary basis.* The Accreditation Board of Engineering Technologies (ABET), meanwhile, adopted a new outcomes-based approach to accrediting engineering programs (ABET 2000) that centered on evidence of student learning in key engineering disciplines. The various health professions—always outcomes-focused because of professional licensing requirements—also moved strongly toward evidence of student attainment as a major component of their recognition processes.

While motivated in part by internal and professional concerns, these early actions by accreditors were influenced by an increasingly active stance by the U.S. Department of Education (DOE). Indeed, in 1989, federal regulations first required accrediting organizations to examine student learning outcomes as a condition of recognition. Since that time, these requirements have become more explicit and stringent. Indeed, the latest criteria governing DOE review of accrediting organizations prominently notes measurement of "student academic achievement" as a condition of recognition.

State governments were also prominent players in the early assessment movement—far more prominent, at first, than accrediting organizations. For better or worse, states like Florida, Tennessee, and Georgia already had comprehensive general examinations in place for students attending public institutions, and by the late 1980s they were joined by others such as New Jersey and South Dakota. Other states including Virginia, Colorado, and South Carolina adopted "institution-centered" assessment approaches that allowed institutions to select their own assessment methods consistent with established goals for student learning, while requiring them to report periodically and publicly on results. By 1989, about half of the states had a requirement of this latter kind in place. As regional accrediting organizations gradually moved into assessment in the 1990s, though, many states appeared happy to allow them to assume the burden of reviewing institutional assessment programs. Wisconsin and North Dakota, for example, explicitly referenced NCA assessment requirements as part of their own accountability processes, while several southern states adopted SACS criteria as part of their own "report cards" or "performance indicators."

A range of other forces have stimulated—indeed, made imperative—accreditation's interest in examining student learning outcomes. Foremost among them are rapidly changing modes of instructional delivery and a burgeoning competency movement in corporate training. At first, distance education was of concern to accreditors because it required institutions to demonstrate essential equivalence in quality between on-campus instructional programs and instruction delivered at a distance. But in order to do this effectively, some way to judge the comparability of learning outcomes was required. More subtly, as distance delivery became asynchronous and student-centered, demonstrated student mastery of the subject matter became the *only* way in which academic progress could be judged. The result has been increasing pressure on accreditors to develop review approaches that are capable of looking at instructional programs that are not anchored in

*AACSB changed its name to AACSB International—The Association to Advance Collegiate Schools of Business in 2001.

"seat time," and that involve resource levels and configurations quite different from those which their established standards were designed to address. The competency movement, visible in a rapidly growing array of achievement-based credentials in professional and technical fields, is exerting similar pressures. Some postsecondary institutions and programs are adopting such approaches themselves to certify achievement—especially in technical and professional fields. And there is growing pressure by students and professional associations to find ways to recognize such certificates in the form of transfer equivalencies, so that students can continue their education at established colleges and universities. Both these developments have important implications for accrediting organizations and are forcing them to pay ever-greater attention to learning outcomes.

Accrediting organizations have thus not been idle in the face of escalating needs to demonstrate what college students know and can do. But they have responded in quite different ways and have moved at different speeds to implement new approaches. Furthermore, evidence is strong that institutions and programs remain only marginally engaged. Few have progressed beyond superficial engagement with "assessment," though accrediting organizations have been asking them to do so for years. Meanwhile, the demands for accountability and the changes in instructional delivery that originally stimulated national concern about student learning outcomes are unabated. At minimum, these conditions suggest:

- Accrediting organizations—both institutional and specialized—must become more aggressive and creative in requiring evidence of student learning outcomes as an integral part of their standards and processes for review.

- The accrediting community as a whole must become more vocal and articulate in talking about evidence of student learning outcomes, and must evolve a common language with which to do so.

- Each individual accreditor must deliberately choose a coherent rationale that underlies its own approach to student learning outcomes, and must be able to use this rationale to clearly and publicly explain the specific procedures that it adopts.

While the specific means that accreditors select will legitimately differ, not addressing these conditions is no longer an option. At the same time, speaking with a common voice as a community cannot help but reinforce the position of peer-based quality assurance in uncertain times.

Defining the Territory

While accreditation has always been concerned about student academic achievement, individual accrediting organizations have varied widely in both their levels of engagement and in the particular ways they have approached the topic. They have also conceptually "mapped the territory" in different ways, and have employed a bewildering array of terms to describe what they do. Partly this is the result of independent development. While familiar elements of the academic landscape like "courses," "curricula," "programs," "faculty," and "standards of academic progress" have evolved reasonably

common meanings through continuing use, linguistic distinctions among labels like "outcomes," "learning," "assessment," and "effectiveness" remain relatively underdeveloped. Each commission or agency begins from its own perspective and has naturally concentrated on those elements of the topic that are closest to its own interests. Discussing "outcomes" sensibly requires a conceptual approach that can appropriately distinguish a) different levels of analysis (e.g., institution, program, individual student), b) different kinds of "results" of an academic experience (e.g., cognitive learning, career success, or satisfaction), and c) different perspectives or viewpoints (e.g., attainment levels at or after graduation, "value-added" or change while enrolled, etc.). Absent such an underlying conceptual scheme, *any* definitions would be arbitrary and hard to explain even if some "common" terminology were adopted.

Discussing "outcomes" sensibly requires a conceptual approach that can appropriately distinguish a) different levels of analysis (e.g., institution, program, individual student), b) different kinds of "results" of an academic experience (e.g., cognitive learning, career success, or satisfaction), and c) different perspectives or viewpoints (e.g., attainment levels at or after graduation, "value-added" or change while enrolled, etc.).

One way to begin to evolve such a common language is to think systematically about each component of the core concern: *evidence of student learning outcomes.* Doing so first requires discussion of what we mean by an "outcome" and how it is different from other potential dimensions of performance. Second, it demands distinctions among units of analysis—at minimum individual students, curricula and academic programs, and institutions. Third, it requires us to explicitly distinguish "learning" from other kinds of "good effects" that students may experience as a result of participating in a postsecondary experience. And finally, it necessitates specific consideration of how we know whether (and to what degree) any of these results has occurred, and to what causes we can attribute them.

- **"Outcomes" vs. "Outputs."** While an *outcome* is clearly a result of institutional and student activities and investments, not all results are properly considered outcomes. Numbers of graduates, numbers of credits produced through instruction, or types of service or research products generated, for example, are clearly results of what an institution does. But they are most usefully defined as *outputs* of higher education. Other dimensions of institutional or program *performance* like efficiency or productivity are equally the results of what an institution does, and assessing them may be important for some evaluative purposes. But they are not the same thing as outcomes. Indeed, this is the whole idea behind the notion of *institutional effectiveness*, which examines the extent to which the institution as a whole attains all of the performance goals it establishes for itself. Although outputs and performance are predominantly institution-level terms, moreover, *outcomes* are only visible by aggregating what happens to individual students. An *outcome*, therefore, can be most broadly defined as something that happens to an individual student (hopefully for the better) as a result of his or her attendance at a higher education institution and/or participation in a particular course of study.

- **"Learning" as a Special Kind of Outcome.** Similarly, relevant and valuable outcomes are not confined to learning because students may benefit from their engagement in postsecondary educational experiences in many other ways. Additional *behavioral outcomes* or *experiences* that may result include employment and increased career mobility, enhanced incomes and lifestyles, the opportunity to enroll for additional education, or simply a more fulfilled and reflective life.

Hopefully these are related to learning in some way. Indeed, evidence that students have obtained such benefits is often used by institutions as a proxy for instructional effectiveness. But such subsequent experiences, however successful, should not be confused with actual mastery of what's been taught. Although equally an outcome and frequently examined, student *satisfaction* with the college experience should not be confused with learning. Certainly satisfaction is important—especially as it is related to persistence and therefore a continued opportunity to learn. *Student learning outcomes*, then, are properly defined in terms of the particular levels of knowledge, skills, and abilities that a student has attained at the end (or as a result) of his or her engagement in a particular set of collegiate experiences.

- **Learning as "Attainment."** Defined in terms of the levels of *attainment* achieved, however, requires learning outcomes to be described in very specific terms. While institutions, disciplines, and professions vary considerably in the ways (and the extent to which) they are described, several broad categories can usually be distinguished. *Knowledge outcomes* generally refer to particular areas of disciplinary or professional content that students can recall, relate, and appropriately deploy. *Skills outcomes* generally refer to the learned capacity to *do* something—for example, think critically, communicate effectively, productively collaborate, or perform particular technical procedures—as either an end in itself or as a prerequisite for further development. Attitudinal or *affective outcomes*, in turn, usually involve changes in beliefs or the development of particular values—for example, empathy, ethical behavior, self-respect, or respect for others. Learned *abilities*, finally, typically involve the integration of knowledge, skills, and attitudes in complex ways that require multiple elements of learning. Examples embrace leadership, teamwork, effective problem solving, and reflective practice. All such taxonomies require institutions or programs to define *learning goals* from the outset as guides for instruction and for judging individual student attainment. Expressed in terms of *competencies*, moreover, such goals describe not only what is to be learned but also the specific levels of performance that students are expected to master. *Certification*, finally, implies that these specific levels have actually been attained.

- **"Learning" as Development.** In many cases, institutions and programs describe student learning not just in terms of attainment but in terms of growth or enhancement. While this construction emphasizes the unique contribution of the educational program to current levels of student attainment, it also requires some knowledge of what levels of attainment were like *before* the student enrolled. *Value-added*, "before-after," or *net effects* are terms that are frequently used to describe such longitudinal ways of looking at development. This perspective is, of course, not confined to student learning. For example, many instructional programs base their claims of effectiveness on things like enhanced income, changes in career, or even increased satisfaction. From the standpoint of quality assurance, both attainment and development may be important. Certification of specific levels of knowledge, skill, or ability for a given program completer—for example, in the form of a licensure examination—is thus intended to guarantee

that the certified individual is able to perform competently under a variety of circumstances. Evidence of this kind will be a particularly important element of "quality" for employers seeking to hire such individuals or the clients who seek their services. But evidence about value-added or net effects will be especially important elements of "quality" for prospective students who are looking for institutions and programs that will benefit them the most, or for policymakers and the public who seek maximum payoff for the resources that they have invested. In either case, it is important to be clear about definitions: *student learning outcomes* should refer normally to competencies or attainment levels reached by students on completion of an academic program; if *development* or *value-added* is intended as well, this meaning should be explicitly stated.

- **Assessment and Learning.** *Assessment*, finally, refers primarily to the methods that an institution or program employs to gather evidence of student learning. But historically, the term has been applied in several ways. For accreditation purposes, the most common meaning refers to the collection and use of *aggregated* data about student attainment to examine the degree to which program or institution-level learning goals are being achieved. But the term assessment is also commonly used to describe the processes used to certify *individual* students or even, in some cases, to award grades. *Evaluation* also commonly refers to evidence-gathering processes that are designed to examine program or institution-level effectiveness. But the object of evaluation usually extends beyond learning outcomes to examine a much wider domain of institutional performance. Differences in concept and terminology are also apparent when describing the informational results of assessment. Here terms like *measurement* and *data* are often used, implying that legitimate assessment should only yield quantitative results. Measurements, though, are a special kind of *evidence*, which is probably the more appropriate term for accreditation purposes. Evidence can embrace the results of both quantitative and qualitative approaches to gathering information, both of which may be useful in judging learning. At the same time, the term evidence suggests both the context of "making and supporting a case" and the need to engage in consistent investigations that use multiple sources of information in a mutually reinforcing fashion. But to count as evidence of *student learning outcomes*, the information collected and presented should go beyond such things as surveys, interviews, and job placements to include the actual examination of student work or performance. As a consequence, *assessment of student learning outcomes* is most appropriately defined for accreditation purposes as the processes that an institution or program uses to gather direct evidence about the attainment of student learning outcomes, engaged in for purposes of judging (and improving) overall instructional performance.

Chart 1 (see page 8) attempts to display some of these key terms in a tabular format so that the relationships among them are apparent. Following the logic of the discussion above, columns in Chart 1 correspond to the specific definitional distinctions revealed by parsing the term "student learning outcomes." Within each column, a variety of commonly used terms is listed, each of which is appropriate for certain purposes. The shaded area, for example, notes those that accreditors

might properly choose to use when referring to evidence of student learning outcomes. Definitional guidance of this kind is not intended to be rigid, and it is expected that accreditation organizations will continue to use similar terms with different inflections and nuances. But common language can both enhance mutual communication and reinforce accreditors as they more aggressively adopt evidence about student learning outcomes as the primary marker of quality.

Chart 1

A Taxonomy of Terms Commonly Used in Connection with the "Assessment" of Student Learning Outcomes

Units of Analysis	Ways of Looking at Performance	Ways of Looking at Outcomes	Ways to Review Performance
Institution	Efficiency	Behaviors ■ Employment ■ Further Education ■ Career Mobility ■ Income	Evaluation
	Productivity		
	Effectiveness		
Program	Output		Measurement
	Productivity	Satisfaction	Indicator
			Assessment
Student	**Outcome**	**Learning** ■ **Knowledge** ■ **Skill** ■ **Ability** ■ **Attitude/ Disposition**	**Evidence of Achievement** ■ **Examinations** ■ **Performances** ■ **Student Work**
		Attainment	
		Development	

Some Dimensions of Policy Choice

Accrediting organizations have frequently acknowledged student learning outcomes as an important dimension of quality—and, in many cases, have actively built or adopted new review standards and criteria to address it. But the particular "stances" that they have adopted vary widely. This is clearly appropriate. Specialized and institutional accreditors have always differed with respect to both the topics that they choose to address and in the level of emphasis that they place on particular areas of performance. But the choices that each has made have, at least up to now, been largely reactive. Accreditors know that concerns about student learning are growing and that providing evidence that it is occurring will be an ever-increasing attribute

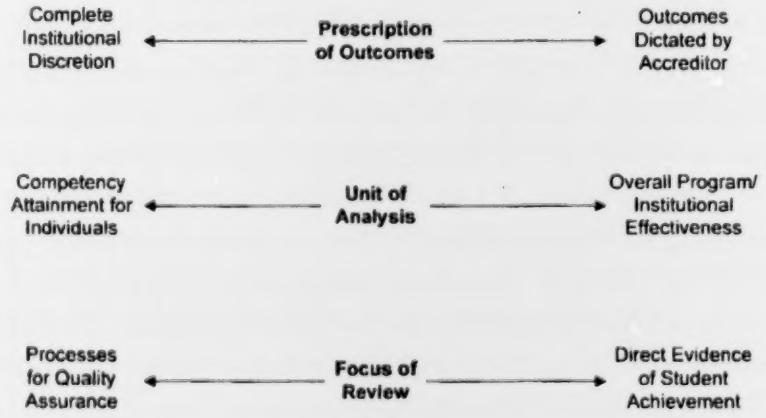
of credible quality assurance. And even if they did not, they would be reminded of the topic's salience routinely by the DOE and state higher education authorities. Much has been done as a result, but most has been accomplished at the behest of others.

Partly as a result, many "assessment-related" initiatives that accrediting organizations have embarked upon have developed piecemeal in the form of a new standard or criterion, or a new requirement for institutional reporting. Essentially implemented as "add-ons" to an existing set of standards and an established framework for review, their development has not always demanded more basic thinking about the choices that a given agency must make in order to address the issue effectively. This is not to say that the many assessment-related policies and requirements that accreditors have adopted have been ineffective. Indeed, by many accounts, a large share of the institutional attention to the topic of taking responsibility for student learning outcomes that *has* occurred in the last decade can be attributed directly to the actions of accreditors. But it highlights the fact that these initiatives have not been particularly systematic or intentional—the result of conscious decisions made in the context of a deliberate set of policy choices. Identifying these policy choices clearly, like defining key terms, can help accreditation's stakeholders make sense of what might otherwise appear a bewildering array of apparently different requirements. Similarly, it may assist individual accrediting organizations to explain and justify their own unique approaches.

For purposes of argument, three dimensions of choice collectively define the "posture" that an accrediting organization can adopt when approaching the task of assuring the quality of student learning outcomes. As depicted in Chart 2, each of these dimensions describes a continuum, not a set of "either/or" choices. Individual accreditors may adopt positions at any point on each, though the dimensions themselves—like any "scale"—are best described in terms of their extremes.

The dimensions are as follows:

Chart 2
Three Dimensions of Policy Change



- **Prescription of Outcomes.** This dimension defines the extent to which an accrediting organization actively specifies the particular learning outcomes that should result from an educational program, or leaves the choice of learning goals entirely up to individual institutions or programs. Most regional and institutional accreditors, for example, see their primary responsibility as ensuring that the institution takes responsibility for assessing and achieving the unique set of learning outcomes that it establishes for itself. This position is consistent with a wider philosophical stance that sees each institution's distinctive mission and particular instructional philosophy as the principal point of departure for peer review. Others adopt a middle ground—emphasizing the assessment of unique mission-driven learning outcomes, to be sure—but also naming a core set of learning outcomes that ought to be adopted (and examined) by all institutions in some way. These are usually "general education" outcomes that include such academic abilities as college-level written and oral communication, higher-order thinking or critical reasoning skills, and quantitative or problem-solving abilities. Additional broad content domains are sometimes named using, for example, the traditional subject area taxonomy of humanities, sciences, and social sciences (and occasionally the arts).

  Specialized accreditors, in contrast, must be far more specific in the learning outcomes that they explicitly name and for which they demand evidence of attainment. At minimum, these outcomes will comprise the specialized core knowledge, skill, and ability domains required for effective practice, though they may occasionally also embrace broader sets of attitudes or knowledge/skill areas (like teamwork or problem solving). In many cases, however, such intended student learning outcomes are implied by the particular areas of coursework required of an accredited program, rather than being explicitly stated in outcomes terms, so course completion is all that is required as evidence that these outcomes are being attained.

  The choice that an accreditor makes on this dimension will thus fundamentally shape the kinds of review approaches that it adopts. Almost by definition, if it does not prescribe particular outcomes, it will be less concerned with actual levels of attainment. It will also tend to concentrate more on examining the adequacy of the evidence provided by the institution or program, and less on what this evidence actually says about the levels of student performance. If particular important outcomes are specified, in contrast, there will likely be more interest in explicitly determining the degree to which the institution or program "measures up" to some common standard of performance for its graduates. What is *not* at issue is that goals must be stated explicitly in terms of student learning outcomes in both cases. In order to effectively address the issue, accreditors must either clearly specify the student learning outcomes they require institutions to address, or must require institutions to do so.

- **Unit of Analysis.** This dimension addresses the extent to which the principal focus of interest for accreditation is placed on ensuring the attainment of identified competencies by *all* of the graduates of the institution or program, or upon ensuring its overall "effectiveness" against more general goals for student learning. The extreme in the first case can best be illustrated by an entirely "competency-based" institution or program in which every student awarded a credential must be certified through some

form of demonstration of mastery that involves more than simply completing a certain number of courses. Like a licensure or certification exam in a professional field, such a demonstration in principal "guarantees" that all graduates possess the requisite competencies at the required levels of mastery. Specific standards of attainment are thus built directly into the program's design and apply to all students enrolled. "Quality assurance" in such a context requires an external reviewer to look closely at the methods and policies that the institution or program employs to back up this guarantee. These might include its grading methods and associated standards of academic achievement, the policies that it establishes to govern student progress and the award of credentials, and the methods that it uses to judge student attainment.

At the opposite extreme of the continuum, the primary object of investigation is not the individual student but rather the institution or program as a whole. This option is the closest to what most accrediting organizations (and virtually all regional accrediting organizations) currently do. While goals for student learning may indeed be established in the form of intended outcomes, these are not put forward as "standards" that every graduate is expected to attain. Rather, they are advanced as templates against which the overall performance of the institution or program can be judged—and hopefully improved. Outcomes statements in such cases are generally less detailed than typical competency statements and they rarely specify required levels of attainment. As a result, a variety of methodologies (such as examinations, portfolios, or surveys) are usually employed to generate a body of evidence designed to demonstrate the degree to which established goals are being met. These assessments rarely apply to all students and, rather than being embedded in the program's instructional and curricular designs, are generally "added on" to them in some way. "Quality assurance" in such a context requires a reviewer to examine the reasonableness of an institution or program's case that it is meeting its goals for student learning in the aggregate, given the evidence submitted. This might imply examining the adequacy of the evidence itself in scope and amount, the reliability and validity of the methods used to generate evidence, or the plausibility of the analyses used to make sense of this evidence. As is typically the case for regional accreditors, moreover, it might suggest that particular attention be given to examining whether or how the institution or program actually *uses* the resulting data for internal improvement.

Three dimensions of choice collectively define the posture that an accrediting organization can adopt when approaching the task of answering the quality of student learning outcomes:

- *Prescription of Outcomes:* The extent to which an accrediting organization specifies particular learning outcomes.
- *Unit of Analysis:* The extent to which an accrediting organization is either concerned about individual student attainment or concerned with overall institutional effectiveness.
- *Focus of Review:* The extent to which the review examines direct evidence of student achievement or is exclusively directed to the adequacy of institutional or program processes for assuring levels of student attainment.

Although accrediting organizations ought to be concerned about both individual student attainment and overall instructional effectiveness, the "center of gravity" that each accreditor adopts on this continuum is important because many of the practical details of its approach to review will automatically follow. For example, the more the choice tilts toward assuring the competency of individual graduates, the more the focus of review must center on what every graduate knows

and can do and on the institution's or program's own internal system of quality assurance. The more the choice moves toward overall instructional goal attainment, the more the focus of review will be placed on the adequacy of the research designs and instruments that the institution or program employs to gather evidence of its overall effectiveness and how it has used this evidence for improvement. Once again, however, *both* will require direct evidence of student learning outcomes if the issue is to be addressed effectively.

- **Focus of Review.** This dimension addresses the extent to which the review actually *does* examine direct evidence of student achievement. At one end of this continuum, direct evidence is invariably (and perhaps exclusively) required. Depending upon the choice made on the dimension above, however, such evidence may or may not be gathered for all students. If the goal is to determine overall program effectiveness, for example, only representative samples might be examined. And the evidence presented might take many forms, ranging from the results of standardized examinations, faculty-designed comprehensive or capstone examinations, authentic performance assessments, deliberately constructed portfolios, and samples of student work generated in response to typical faculty course assignments. But the process must include the presentation of direct evidence of student learning by the institution or program and its critical evaluation as a prominent part of the review.

  At the other end of this continuum, the focus of review is placed exclusively on the adequacy of the institution or program's *processes* for assuring adequate levels of student attainment. Typically, this would include such matters as curriculum review and approval, policies for student progress and good standing, policies governing the award of a degree, grading policies and standards, and processes for reviewing and improving faculty teaching performance. Actual student work or the results of student assessments of learning might not be examined at all in such a review. The process of *academic audit* in which established protocols and audit trail methods are used to determine a) the overall quality of the processes in place compared to a standard "ideal type" for such processes, and b) the extent to which the institution actually follows its own processes is at this end of the continuum. So is the more traditional and familiar concept of academic program review.

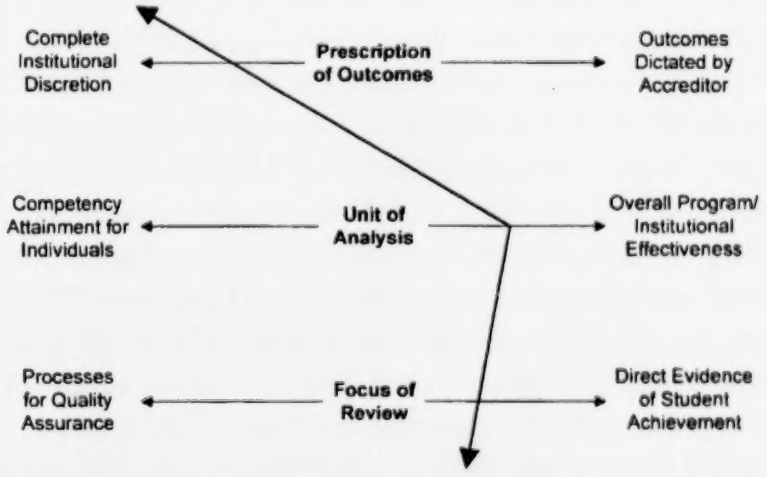
  While most accreditors will likely wish to pay attention to both direct evidence of student learning and internal quality assurance processes, the center of gravity of the choice they make on this dimension may again have substantial practical consequences. At present, for example, most regional accrediting organizations call for some direct evidence of student academic achievement, while specialized accreditors are mixed in this respect. But most accreditors lack experience in evaluating the adequacy of this evidence and almost none have established clear standards against which to do so. Partly as a result, the discussion often focuses excessively on methodology instead of looking at actual levels of student attainment. Equally often, the kinds of evidence of student learning actually collected rarely go beyond indirect measures like self-reported attainment on surveys or focus-group interviews. Similarly, current accreditation practices

frequently examine the policies that institutions and programs establish to assure quality, but they rarely do so with the structure, depth, and methodological sophistication typical of the academic audit. Consequently, their reviews do not usually address how effectively the institution or program is actually carrying out its own processes or the extent to which these processes determine its ability to consistently deliver graduates who meet established standards of attainment. In sum, the choice that accreditors make on this dimension, consciously or unconsciously, has a decisive impact on the degree to which they are actually addressing the issue of student learning outcomes.

Positions on each of these three dimensions of choice thus define a range of quite different postures. But although the choices made on each dimension are in principal independent, the actual choices made tend to define a relatively limited set of profiles. Some of these, moreover, are of only limited value in effectively addressing the issue of student learning outcomes unless they are undertaken in a particular way. Among the most prominent of these modal types are the following:

- **Program Assessment.** This approach is the most typical of current accreditation practice, and it is the result of a specific combination of policy choices:

Chart 2A
Program Assessment



On the first dimension, the learning outcomes of interest are usually those that the institution or program selects for itself, with the occasional exception of a few highly valued "general education" outcomes. On the second, the program or institution as a whole is the clear focus of attention, not individual levels of student attainment. On the third, some evidence of attainment is typically required in the form of "assessment results," though these may be drawn from samples of students and the methods used are not usually embedded in the curriculum. As a result, this

Summary of Decisions About Evidence and About the Use of Evidence of Student Learning Outcomes in Accreditation Review and in the Determination of Quality

Accreditors need to address six core questions in order to effectively incorporate student learning outcomes into accreditation review and in the determination of institutional and programmatic quality:

1. **What is a "student learning outcome?"**

   An "outcome" is something that happens to an individual student as a result of his or her attendance at a higher education institution or participation in a particular course of study. But there are many types of outcomes other than student learning. A *"student learning outcome,"* in contrast, is properly defined in terms of the particular levels of knowledge, skills, and abilities that a student has attained at the end (or as a result) of his or her engagement in a particular set of collegiate experiences.

2. **What counts as evidence of student learning?**

   Evidence of student learning can take many forms, but must involve a *direct* examination of student levels of attainment—either for individual students or for representative samples of students. Examples of the types of evidence that might be used include (but are not limited to):

   - faculty-designed comprehensive or capstone examinations and assignments
   - performance on external or licensure examinations
   - authentic performances or demonstrations
   - portfolios of student work over time
   - samples of representative student work generated in response to typical course assignments

   Evidence such as survey self-reports about learning, focus groups, interviews, and student satisfaction studies are certainly useful in the accreditation process, but do *not* constitute direct evidence of student learning outcomes.

3. **At what level (or for what unit of analysis) should evidence of student learning outcomes be sought?**

   Different accreditors may choose different levels of aggregation when seeking evidence of student learning outcomes, depending upon their purposes. Options include:

   - individual student
   - specified groups or aggregations of students
   - courses or groups of courses
   - programs or schools within an institution

- institutions
- combinations of the above

4. To what extent should particular student learning outcomes be specified by accreditors?

This choice must be made explicitly by individual accreditors, depending upon their circumstances. Options range from:

- complete prescription of outcomes by accreditor (for example, specific professional skills required for practice)
- accreditor expects institution (or program) to choose and define outcomes
- both (for example, core set of outcomes on which accreditor and institution agree)

5. What models are available to accreditors when choosing an approach?

Different combinations of policy choices determine the approach to addressing student learning outcomes that any particular accreditor develops. Among the most prevalent and useful points of departure are:

- *program assessment*, in which outcomes are determined largely by the institution or program, the effectiveness of program or institution as a whole is the focus of interest, and direct evidence of student learning is collected. [Note: care should be taken here that there really is direct evidence of student learning available.]
- *academic audit*, in which the effectiveness of student learning outcomes is examined indirectly by looking at the adequacy of institutional (or program) processes for assuring quality. [Note: useful for determining the effectiveness of quality practices, but does *not* involve direct evidence of student learning outcomes.]
- *academic standards audit*, in which the adequacy of academic standards for grading and awarding credit is checked by direct reference to actual assignments, requirements, and student work. [Note: follows the audit methodology above, but incorporates direct evidence of student academic achievement into the audit process.]
- *third-party certification*, in which student competency is examined directly by an external body. [Note: not typically undertaken by accreditors, but useful to the accreditation process as a solid form of evidence.]

All are useful to accreditation, so long as care is taken to incorporate direct evidence of student learning.

6. What issues should be anticipated?

A number of important issues arise when any accreditor addresses the topic of student learning outcomes as part of the accreditation process. Among them are:

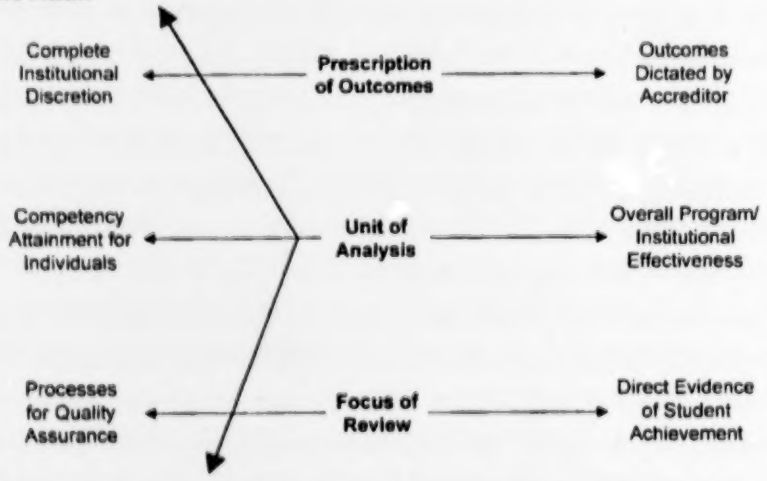
- what standards of evidence will be used?
- how will evidence be used in determining quality (and in making an accreditation decision)?
- how will faculty be involved?
- how will the interests and concerns of external stakeholders be addressed?

approach encourages the development and deployment of special-purpose assessment techniques like portfolios, examinations, and surveys that are administered in addition to regular faculty grades. But unless care is taken to ensure that institutions understand that direct evidence of student attainment is required, this approach can also easily slip into the typical "program review," in which only processes are generally examined.

Strengths of this approach, when done properly, are that it directly encourages institutions and programs to examine student learning in a visible and actionable fashion, and that it provides direct and credible evidence about the overall extent to which intended learning outcomes are being achieved. Drawbacks are that it may encourage institutions and programs to develop a duplicative assessment "superstructure" that is largely directed toward external reporting, rather than inducing faculty to take day-to-day collective responsibility for learning, and that it does not guarantee that *all* graduates of the institution or program have met established goals for learning. When adopting this approach, moreover, accrediting organizations need to pay particular attention to the extent to which the results of assessment are actually being used, and the kinds of changes in instruction that are made in response.

- **Academic Audit.** While the principal examples of program assessment can be found among U.S. regional accrediting organizations, the prototype academic audit systems were developed in the early 1990s in the United Kingdom, New Zealand, and Hong Kong. In contrast to program assessment, audit's main focus is not learning outcomes *per se*, but rather the adequacy of the processes that the institution employs to assure the academic integrity of its credentials. Accordingly, this approach is equally the result of a distinctive set of policy choices on the three dimensions discussed:

Chart 2B
Academic Audit



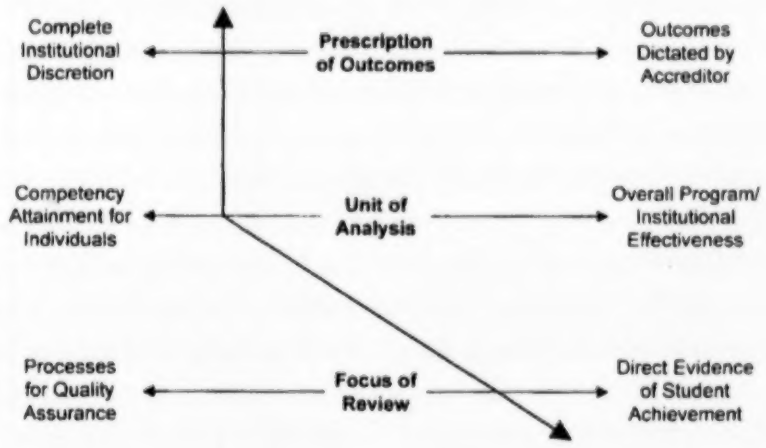
On the first, like program assessment, particular outcomes are usually not specified by the reviewing agency, but are rather left up to the institution or program

to decide. On the second, the effectiveness of the institution or program as a whole remains the primary object of interest—though the processes that are examined in audit are supposed to be those that ensure the integrity of its credentials. On the third dimension, however, no direct evidence of student attainment is typically presented, though the institution's "assessment system" may be included among the processes under review. (In saying this, though, it is important to remember that all of the countries that have adopted audit *also* have some kind of external examiner system that simultaneously looks at direct evidence of student attainment.)

Proponents of this approach claim that it can avoid some of the major drawbacks of program assessment because it does not require the development of additional—and often controversial—direct measures of learning outcomes. The fact that audit is relatively unobtrusive, that it relies on documentation already in place at the institution rather than demanding additional "self-study," and that it employs well-developed review protocols to examine real processes in detail during the site visit, are also claimed as strengths of the process. But classic academic audit has major weaknesses as well—especially in the current U.S. context. The foremost is the fact that, by itself, the approach does not require the institution or program to produce any direct evidence of student learning outcomes. At the same time, because it is principally focused on "inspecting" processes already in place, it does not explicitly encourage systematic improvement.

- **Auditing Academic Standards.** One virtue of the framework for choicemaking posed by the three dimensions, though, is that it can suggest new kinds of models for review. One promising example is the notion of "auditing" academic standards instead of internal processes. This approach involves using the kinds of audit mechanisms employed in Europe and Australia, but directing them explicitly to examine the ways in which an institution or program assures the attainment of student learning outcomes:

Chart 2C
Auditing Academic Standards

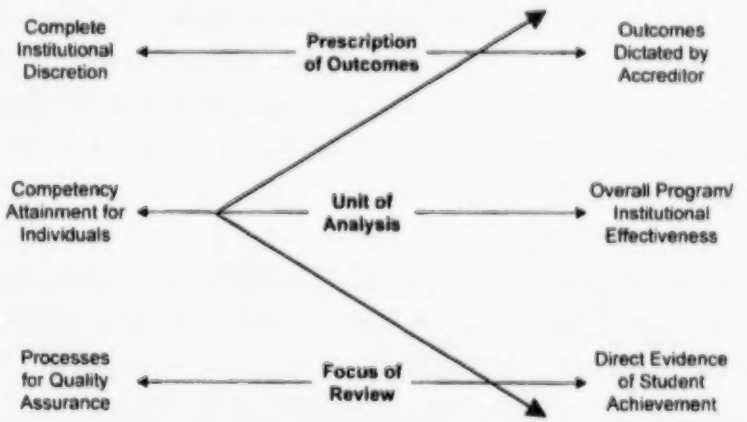


On the first dimension, the specification of outcomes remains predominantly the province of each institution or program. On the second, though, the focus of attention shifts to the individual student, because the primary objective is to determine the degree to which the institution or program can credibly claim that all of its graduates meet acceptable standards of attainment through the academic standards that it upholds in its grading processes and in the award of its credentials. On the third dimension, direct evidence of student achievement is clearly required. Unlike the program assessment model, however, such evidence would most likely be presented (and "audited") in the form of actual student work products, generated naturally in the course of a student's academic career.

In practice, this approach most resembles the "external examiner" system in the U.K. Under this system, representative samples of actual student work are read by third-party examiners on a periodic basis to ensure that local grading standards are consistent with established academic expectations. The approach to accreditation currently being developed by the Teacher Education Accreditation Council (TEAC) also has much in common with this approach, although the primary focus here is the program's assessment system. Potential strengths of this approach are its clear focus on student academic achievement and its authentic quality. Potential weaknesses are the same as any audit—the fact that the process does not in itself induce improvement and that there is no guarantee that all students meet all standards.

- **Third-Party Certification.** Although not likely to be employed by accrediting organizations, the notion of third-party certification serves as a final illustration of how the proposed framework for choice-making can define a wide range of approaches. Essentially, certification demands direct demonstrations of competence on the part of each graduate in order to ensure that specified levels of mastery are being attained. This approach is familiar and is widely practiced by professional licensing bodies through some kind of examination system. Despite its radical differences from extant accreditation approaches, this approach also follows naturally from a particular set of policy choices on the three dimensions:

Chart 2D
Third-Party Certification



On the first dimension, intended student learning outcomes are clearly specified and, indeed, provide direct guidance for constructing the needed certification assessments. On the second, the individual student is the main, if not the exclusive, focus of attention. And on the third, direct evidence of student achievement is the sole basis on which certification is granted.

The resulting system is extremely credible and has the virtue of directly supporting the program or institution's "guarantee" that the credentials of its graduates are valid. On the other hand, the lack of flexibility inherent in this approach and its exclusive focus on individual student attainment makes it largely inappropriate for accreditation purposes—though an institution or program's participation in, and results obtained by its students through, such certifications can be extremely valuable evidence in any accreditation process.

Applying the three dimensions of choice can result in various profiles or approaches to accreditation review:

- Program Assessments
- Academic Audit Process Audit)
- Academic Standards Audit
- Third-Party Certification

These four illustrations of how the three dimensions of choice can be applied are not intended to be exhaustive. Rather, they are advanced to demonstrate the flexibility of the scheme in evolving quite different ways to ground a policy stance about evidence of student learning outcomes. By making conscious and deliberate choices about how to proceed on each of these three dimensions, different actors may legitimately end up with very different profiles. But by approaching the task in the context of a visible common framework, their distinctive choices can be more widely understood and related within the accrediting community. At least as important, the differences among them can be more clearly and persuasively explained to those outside it.

Some Enduring Issues

As accreditors approach the task of developing an appropriate response to the challenge posed by student learning outcomes, a number of issues repeatedly arise. Some are operational, such as whether and how to include particular kinds of stakeholders or how to ensure appropriate levels of faculty involvement. Others are conceptual, such as what kinds of evidence should be considered (and how the quality of presented evidence ought to be judged), or what to emphasize in a review. In each case, there is no single "right" answer about how to proceed. But clearly identifying the nature of the issue, and noting the range of choices that might be made to address it, is of value in itself.

- **Standards of Evidence.** This issue concerns the kinds of evidence of student learning that should be considered acceptable by an accreditor, whatever the approach adopted. To some extent, of course, answers will depend on the choice that the agency has already made about direct evidence of student attainment. But once it is decided that some kind of evidence will be needed, accreditors will need to define what "good" evidence looks like. One set of standards here might address the *design* of an institution or program's assessment system, focusing specifically on the extent to which this design is capable of credibly demonstrating that established goals for learning are being attained. Specific elements of design that might be established as standards here could include: a) *comprehensiveness*, or the degree to which the assessment system is capable of providing evidence about the full range of student learning

outcomes established by the institution or program; b) *multiple judgment*, or the extent to which multiple sources of evidence are used in a mutually reinforcing way to examine outcomes; c) *multiple dimensions*, or the degree to which different facets of student performance with respect to established learning outcomes can be investigated so that patterns of strength and weakness can be identified (and addressed); and d) *direct evidence*, or the extent to which the approach relies upon direct measures of student attainment instead of self-reports about learning or proxy indicators of attainment like graduation rates or graduate placement.

Another set of standards might address the quality of what is presented against recognized attributes of credible evidence. Standards here might address such things as: a) *validity*, or the degree to which the methods used yield evidence that adequately reflects the nature of the underlying ability being assessed; b) *reliability*, or the extent to which these methods produce the same result consistently over time or across contexts; and c) *representativeness*, or the degree to which the evidence presented—especially if based on a sample—truly represents the performance of the wider population. Standards like these, of course, are drawn directly from the measurement literature and can be applied with varying degrees of precision. Some regional accreditors, for example, have addressed this question in general terms in their publications. Others, like TEAC, have developed explicit review protocols based on the educational measurement literature.

Like any of the dimensions of choice outlined earlier, where a particular accreditor chooses to come down on the question of evidential standards might legitimately differ. But as external stakeholders focus increasingly on student learning outcomes, it is clear that some kind of standards to address evidential quality will be needed.

- **Value-Added.** This issue centers on how (and whether) to require institutions or programs to assess the extent of student growth and development with respect to learning in addition to simply the "adequacy" of current attainment levels. For an accreditor, the choice here will depend largely on the purposes of review and, in some cases, attention to both may be appropriate. For specialized accreditors, choices on this dimension will tend toward end-point assessment—largely because of the overwhelming importance of assuring that all program graduates have attained the levels of competence needed for effective professional practice. For institutional accreditors, choices may tend more toward demonstrating growth and development in order to establish the institution or program's unique contribution to learning and to encourage improvement. But these tendencies will be approximate at best. Again, the point is that the choice needs to be deliberate and defensible, whatever the resulting approach may look like.

  Accreditors also need to be aware of the substantial methodological issues that accompany any attempt to assess "value added." First, determining growth requires information about students' knowledge and skill at the point at which they entered the program in addition to evidence of ultimate attainment—both of which may contain errors. Second, claiming credit for development requires an attribution of cause—that the instruction received was really responsible for any observed change in student ability levels. When looking at evidence of "growth," therefore, reviewers will need to be mindful of both these issues.

- **Use of Results.** This issue focuses on how the institution or program uses the evidence it gathers about student learning outcomes to improve curriculum and pedagogy. All accrediting organizations will claim that they are interested in "improvement." But the extent to which they consciously direct their standards and review processes toward examining institutional improvement efforts may vary considerably. Some accreditors may accept fairly crude and indirect forms of evidence if it can be established that the institution or program is learning something of value and is acting on what it knows. Others will rightly insist on much higher evidential standards because their primary purpose is to validate the institution or program's claims that its graduates meet specific levels of attainment. Regardless of where an accrediting organization places its emphasis on this issue, some way to determine the level and quality of an institution's or program's use of results will be required.

  Systematic attention to this matter, moreover, might involve developing rubrics or standards around several aspects of "use." Among them might be: a) *dissemination*, or the degree to which the results of assessment are communicated to appropriate audiences and the degree to which selected members of the institutional or program community are aware of them; b) *extensivity*, or the breadth with which such results are known across departments, units, subfields, or individual faculty; c) *intensivity*, or the degree to which results of assessment are incorporated into regular discussions and decision-making processes; and d) *visible change*, or the extent to which specific changes in curriculum, pedagogy, or policy can be credibly attributed to the presence of assessment results. Audit processes might be usefully employed to examine each of these attributes of use, and institutions or programs might be given specific guidance to address them when constructing the body evidence that they present.

Enduring Issues...

- *Standards of Evidence:* What is acceptable evidence of student learning?
- *Value-Added:* Should we assess the extent of student growth and development?
- *Use of Results:* How will evidence of student learning outcomes be used to improve curriculum and pedagogy?
- *Reliance on Outcomes:* What is the relative weight an accreditor places on evidence of student attainment?
- *Faculty Involvement:* Are faculty actively involved in the process of developing evidence related to student learning?

- **Reliance on Outcomes.** This issue centers on the relative weight that an accreditor places on evidence of student attainment when making decisions about the accredited status of an institution or program. On the one hand, there is clear pressure to increase the salience of such evidence in relation to more traditional "markers" of quality based on resources and processes. And in the case of distributed and distance-delivered instructional designs, most of these traditional markers simply do not apply. On the other hand, there remains a substantial consensus across the accreditation community that evidence of outcomes alone is insufficient to make adequate or credible judgments. In addition to inherent doubts about the validity and reliability of assessment, accreditors know that they will encounter resistance from faculty and institutions to basing judgments of "quality" solely on evidence of student attainment.

  Most accreditors are responding to the implied tension by increasing the visibility of standards and review requirements that address student learning,

while changing the nature of more traditional "resource/process" requirements to increase their flexibility. Examples include reduction in the number and specificity of requirements that address faculty resources, instructional activities, and the adequacy of student support resources. And given current (and anticipated) DOE concern that recognized accreditors address some very specific components of educational programs like student complaint procedures, it is unlikely that the accreditation community will be able to entirely abandon process standards even if there was a desire to do so.

But the manner in which an accreditor chooses to address student learning outcomes remains important. One approach—and so far the prevalent approach—is to adopt *additional* standards and review elements to address student learning outcomes. Examples include the "institutional effectiveness" standards adopted by a number of regional accreditors and the separate "educational effectiveness" review process just adopted by WASC. This approach has the virtue of calling explicit attention to matters of student learning in ways that are visible to both institutions and stakeholders. But it may have the unintended consequence of isolating conversations about learning from the mainstream of discussion and encouraging them to be dealt with as "compliance" issues. The alternative is to attempt to *integrate* attention to student learning outcomes throughout the agency's review standards and processes in a way that cuts across all aspects of an institution or program. This approach has the strength of emphasizing that student learning is the ultimate "bottom line" and that all resources and processes ought to be aligned to facilitate it. But because addressing learning outcomes is both unfamiliar and hard, it may induce institutions to fall back into the mode of simply describing their programs in traditional terms, absent a specific "learning standard." Certainly, there is no single right way out of this dilemma. But accreditors should be aware of its existence and should be clear about what choices that they have made and why.

- **Faculty Involvement.** This issue centers on the extent to which faculty are actively involved in the process of developing evidence related to student learning outcomes and, as a consequence, in the accreditation process itself. On the one hand, virtually all accrediting organizations will require that faculty be "actively and broadly involved" in every aspect of assessment. On the other, the actual collection and interpretation of evidence about student attainment—especially if it is implemented in the form of the typical "assessment program" visibly distinct from day-to-day teaching and learning activities—can be a matter of considerable technical complexity. As a result, line faculty may or may not be directly involved in every aspect.

  Given this situation, accreditors need to think carefully about what they really mean when they require "faculty involvement." At one level, faculty should certainly be broadly and actively involved in *establishing goals* for learning in the first place. As a result, standards and review processes should indeed examine the extent of faculty involvement in goal-setting, and whether it has consequences for curriculum/course design and for teaching. At some institutions, for instance, "goals" for general education have been established largely for the purposes of designing

assessments, not for the purposes of guiding pedagogy and instructional design. At a second level, faculty need not always be directly involved in the process of selecting or designing *methods* to assess student attainments. If such methods are used to directly certify individual student performance, they will and should be involved. But if they are used only periodically to determine overall program effectiveness, not every faculty member need be consulted and even fewer will likely do the work. What is important is that those who make the decisions and who collect the requisite evidence are accorded the legitimacy to do so by their peers. At a third level, faculty ought to be visibly involved in *interpreting* and *drawing conclusions* based on the resulting evidence. Again—and especially if a primary intent of accreditation is to stimulate local improvement—both standards and review processes should be tailored to determine the degree to which this is happening. At a final level, there might or might not be a need for broad faculty involvement in the process of *assembling evidence* about the attainment of student learning goals for purposes of accreditation. Under a traditional "self-study" approach in which an institutional presentation is carefully crafted to make a case for educational effectiveness, a broad level of involvement should probably be expected. In the case of an academic audit, though, only a few individuals—and likely administrators—may be involved in the process of assembling evidence—though auditors should be encouraged to inquire into the role faculty actually play in the processes being audited. Again, the point is not simply to call for "involvement," but to carefully think through what "involvement" really means.

- **Stakeholder Involvement.** This issue concerns the extent to which learning outcomes should be defined and assessed strictly from the perspective of the institution or program's own faculty, or whether external voices—like those of employers or relevant professional communities—ought to be heard. For specialized accreditors, the choice is clear: professional communities should be visibly and frequently involved in at least the process of establishing student learning outcomes. Alternatively, the outcomes established by the program's faculty should be demonstrably aligned with accepted professional standards of practice or acknowledged areas of competence. More specifically, the kinds of evidence of student attainment generally accepted should at minimum include such things as pass rates on relevant professional licensing examinations and tracking performance in later professional practice. For institutional accreditors the choice is less clear and will depend largely on institutional mission. To the extent that the institution offers vocational or professional programs where a clear external community of practice is present, stakeholder involvement in establishing goals for student learning should be prominent. For both, it is important to note that the DOE also has a position on this issue: if a program prepares students for practice, accreditors are obliged to ensure that appropriate stakeholder groups are involved in assessment.

For all of these issues, choices will need to be made about how to proceed. But by understanding the underlying dimensions of choice more fully, accreditors will be in a better position to both make informed decisions and to explain what they have done to the many audiences who may be interested.

Concluding Thoughts

Two things are clear from the previous discussion. First, the task of addressing student learning outcomes has no single or simple answers. Second, it is imperative that accreditors take it on. What is required for them to do so? Three lines of collective action seem warranted.

- First, the accrediting community needs to develop a coherent and understandable way to *explain* its collective approach to the matter of evidence of student learning outcomes to outside stakeholders. This rationale must make it clear that there are appropriate differences among accreditors in how they choose to engage student learning, but that *all* are doing so in appropriate and rigorous ways. But it must also make clear that they are requiring some measure of direct student attainment—not merely proxies for it—in their various approaches.

- Second, accreditors need a *language* with which to talk to one another about what they are doing. This may or may not require the development of a common vocabulary. But it does require a common conceptual framework that allows varied members of the community to understand the key distinctions and similarities among their approaches.

- Third, all would benefit from the development of *common resources*. These might include sharing review approaches and techniques like standards of evidence or ways to "audit" institutional or program assessment efforts. It might also include more fundamental research and development efforts directed toward creating better tools for examining learning or identifying best practices. There is a growing fund of experience to build on here, both within and outside the accreditation community. But the growing body of experience has not yet been effectively "rounded up" for use by the community in common.

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CHEA is pleased to provide information and assistance related to accreditation issues and processes to colleges and universities and other interested parties.

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